

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMY M. FILLER,

Defendant.

Case No. 19-CR
[18 U.S.C. §§ 922(a)(6) & 924(a)(2)]

19-CR-114

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about October 28, 2018, in the State and Eastern District of Wisconsin,

JEREMY M. FILLER,

in connection with the acquisition of four firearms from Tom's Military Arms & Guns, a federally licensed firearms dealer, in West Bend, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Tom's Military Arms & Guns as to a fact material to the lawfulness of the sale and disposition of such firearms under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearms described below, Jeremy M. Filler falsely stated on the Firearms Transaction Record (ATF Form 4473) that he was the actual buyer of the firearms when, in fact, as Filler well knew, he was acquiring the firearms for someone else.

3. The firearms are further described as:

- a. a Ruger, model LCP, .380 caliber pistol, bearing serial number 372176808;
- b. a Taurus, model G2, 9mm pistol, bearing serial number TLR14967;
- c. a Taurus, model G2, .40 caliber pistol, bearing serial number SLW96043; and
- d. a GSG, model 1911, .45 caliber pistol, bearing serial number GI123439.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 14, 2018, in the State and Eastern District of Wisconsin,

JEREMY M. FILLER,

in connection with the acquisition of four firearms from Tom's Military Arms & Guns, a federally licensed firearms dealer, in Franklin, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Tom's Military Arms & Guns as to a fact material to the lawfulness of the sale and disposition of such firearms under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearms described below, Jeremy M. Filler falsely stated on the Firearms Transaction Record (ATF Form 4473) that he was the actual buyer of the firearms when, in fact, as Filler well knew, he was acquiring the firearms for someone else.

3. The firearms are further described as:

- a. a Taurus, model G2, 9mm pistol, bearing serial number TLS 23461;
- b. a Taurus, model G2S, 9mm pistol, bearing serial number TLS 55746;
- c. a Ruger, model EC9S, 9mm pistol, bearing serial number 455-26163; and
- d. a Diamond Back, model DB9HP, 9mm pistol, bearing serial number YJ9530.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL:

FOREPERSON

Date: 6/18/19



MATTHEW D. KRUEGER
United States Attorney